

Exhibit B

Pete Patterson

From: Drew Harris [drew.harris@oag.state.tx.us]
Sent: Friday, March 18, 2011 3:41 PM
To: David Thompson; Pete Patterson
Subject: RE: D'Cruz v. McCraw

David,

If Mr. D'Cruz is no longer a proper plaintiff, we do not oppose his withdrawal from the case.

-Drew

>>> David Thompson <dthompson@cooperkirk.com> 3/18/2011 2:33 PM >>>

Drew,

Just to be clear: do you also oppose the withdrawal of Mr. D'Cruz as a plaintiff?

David

From: Drew Harris [mailto:drew.harris@oag.state.tx.us]
Sent: Friday, March 18, 2011 3:30 PM
To: Pete Patterson
Cc: David Thompson
Subject: Re: D'Cruz v. McCraw

Pete,

We feel that you have waited too long to add brand new individual parties, especially given that the discovery/dispositive motion deadline is less than two months away. We will oppose.

Regards,
Drew

>>> Pete Patterson <ppatterson@cooperkirk.com> 3/18/2011 10:27 AM >>>

Drew,

I'm writing to seek the State's consent on a motion Plaintiffs plan to file early next week in *D'Cruz v. McCraw*. Mr. D'Cruz's family has relocated and he is currently living in Florida. Accordingly, we plan to file a motion to dismiss Mr. D'Cruz as lead plaintiff and to substitute three other Texas-based NRA members. This would require amending the complaint, and thus we are seeking the State's consent pursuant to FRCP 15(a)(2). The legal allegations will remain the same – we will just substitute the new plaintiffs for Mr. D'Cruz and provide basic background details about them. Because the new plaintiffs are all NRA members, this change won't affect any of the substantive analysis, including standing.

Regards,

Pete